

STEIN - NEED THIS BACK

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A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
124	268	2-11	Section 2.2.3.6	R. Tom, DWR	Although the Comprehensive Monitoring, Assessment, and Research Plan (CMARP) is listed as a part of the mitigation monitoring plan under Phase III (page 1-13), it should also be mentioned under the section entitled Watershed Management Coordination as a tool for CALFED to use when implementing projects and providing cost-effective approaches to individual watershed management activities.	T	
1068	269	2-11	Section 2.2.3.6	SZ, EPA	Watershed Management Coordination: The description of watershed management and the identified potential consequences will need to be adapted to accurately reflect the CALFED watershed management strategy as it is more fully developed. Between the Public Draft and Final EIS/EIR, we anticipate that watershed management and CALFED- associated activities will be revised to better define and develop the activities that will enhance watershed management consistent with CALFED goals. This may likely result in revisions to the environmental consequences identified in Table 3.1-1 (page 2) and that are described on page 6-115.		
23	270	2-12	bullet on south delta mods	DWR	review entire section to focus on south delta modifications and use language provided by DWR (Interim South Delta Program)- Sandino		
103	271	2-12	section 2.2.3.7 second paragraph.	K. Kelly, DWR	Delete "and on-stream". Third paragraph first sentence. add "in Phase III" after "evaluated". second column. See comment for page 2-8. Also the bullet descriptions under this category are so ambiguous I can't tell which one is the barriers.	C	
102	272	2-12	Section 2.2.3.7, 2nd Column, 1st full paragraph	Sandino, DWR	South Delta Modification bullet is an overstatement, which I believe should be modified.. ISDP is intended to result in the modification of DWR requirement to satisfy certain South Delta Water Quality objectives, but ISDP will not result in the "removal of current regulatory constraints." DWR only wants its water rights permits modified so it is not responsible for meeting South Delta Water Quality objectives. Also, ISDP will permit DWR to increase pumping <i>at times</i> , but the pumps will not be operating at full physical capacity at all times as a result of ISDP, which is the impression given by this statement.	T	
804	273	2-12	Section 2.2.3.7	Choward, USBOR	The process to develop the storage capacity should be discussed.		
9	274	2-12, to 23	Section 2.2.3.7	Robin Reynolds, CDFA	The determination of capacity ranges must be subjected to analysis in the forum of the EIR. These are discretionary decisions, which not only have a potential to impact the existing environment, but also the sizing and allocation of capacities could form the basis for feasible mitigation for certain project impacts.		

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136	321	2-23	Line 5	Spaar, DWR	Water Storage and Conveyance - The description in the 1st paragraph does not parallel the description of the 4 intakes that follows. Three isolated conveyance channels are indicated, followed by a description of each with a 4th intake (Hood) stuck in the middle of the bulleted descriptions. This makes it difficult to follow the alternative description. Suggest indicating in the 1st paragraph that the Hood intake is a 4th intake, and move it from the 3rd intake described (2nd column, top 2-23) to the 4th..	C	done
620	322	2-23	2.2.5	Rick B., CALFED	delete this section		
112	323	2-25		K. Kelly, DWR	How about maps of the problem and solution areas?	P	done 1
39	324	2-25	last sentence, right col	DFG	remove phrase 'or ecologically preferable'		done 1
522	325	2-25	Right Column, Last Paragraph, Last Sentence	DFG	Delete the phrase "or ecologically preferable". Clearly it is not ecologically preferable to only address one of the problem areas for salmon restoration.		done 1
1124	326	2-25	Section 2.3.1, 3rd paragraph	GL, EPA	The description of the solution scope (described in the third paragraph) is not consistent with the description in the purpose and need statement approved by the Management Team. The last sentence should be rewritten to read "Thus, although each action will not affect the entire geographical solution area, certain actions will directly or indirectly affect areas within the Central Valley watershed, the Southern California water system service area, Suisun Bay, San Pablo Bay, San Francisco Bay, and portions of the Pacific Ocean out to the Farallon Islands and a near-coastal band extending from about Morro Bay to the Oregon border."	**	done 1
10	327	2-25	Section 2.3.1, last paragraph on page	Robin Reynolds, CDFA	The Lead Agency should justify why elimination of the commercial and sport take of these species, and control of predation, are not even considered. It is not rational to continue to allow take of endangered species for profit and pleasure, and not even consider control of exotic predators, while at the same time proposing draconian measures with huge costs, uncertain benefits, and very significant adverse impacts on the existing environment to enhance these same populations.		5.6

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1071	1634	P. 2-27 or 2-31	Section 2.4 or 2.6	SZ, EPA	<p>In February 1994, the State initiated a comprehensive process to consider the requirements of CZARA and update the existing statewide Nonpoint Source Program rather than create a separate program dealing exclusively with coastal waters. The state's updated program, as described by the Coastal Nonpoint Pollution Control Submittal (September 1995) and Initiatives in Nonpoint Source Management (September 21, 1995) calls for managing nonpoint sources on a watershed basis and focuses on nonpoint source problems associated with pesticides, grazing, urban runoff, hydromodification and abandoned mines. It also acknowledges that because of the dispersed nature and number of nonpoint source generating activities, the large number of private and public entities responsible for these activities, and the important role of local governments, "the California program can be characterized as one of building partnerships among all interested parties."</p> <p>As of February 1998, California is still working to improve the nonpoint source program and to receive full program approval from U.S. EPA in compliance with CZARA.</p>		<p><i>See 1632</i></p>
1392	1635	P2-13 to 2-23	Alternatives Description	P. Wisheropp: Woodward-Clyde	CEQA requires the need or justification for an action. Yet the alternatives are described with many features without an explanation of why the feature is needed. The ERP features are a good example of a feature that lacks the justification.		<p><i>5</i></p>
7	1642	Page 2-1,	section 2-1	Robin Reynolds, CDFA	<p>The "alternatives" in the ADEIR do not meet the requirements of CEQA for a range of reasonable alternatives: "The range of reasonable alternatives to the proposed project shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant effects." (State CEQA Guidelines, Section 15126 (d)(2). The CDFA and others have identified very major adverse impacts for all the alternatives, especially the <u>"common programs."</u> There must be a range of reasonable alternatives which avoid or lessen these impacts, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (State CEQA Guidelines, Section 15126 (d)(1).</p>		

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8	1643	Page 2-4		Robin Reynolds, CDFA	<p>"A major outcome of the scoping process was the conclusion that four components should be included in each alternative without variation." Approval of discretionary actions with a potential to impact the existing environment, in the face of significant controversy clearly identified by participants in the process is an improper, though certainly innovative and unique use of the CEQA scoping process. These decisions must be subjected to CEQA review in the public forum of the EIR.</p> <p>The CDFA requests, pursuant to Public Resources Code Section 21167, subdivision (f) for a copy of any and all notices of CEQA determinations regarding approval of any of the "Common Programs" or other elements of the CALFED program, including but not limited to "Category III" projects or programs.</p>		
1123	1647	pp. 2-19 through 2-23	Section 2.2.4.3	GL, EPA	Under "Summarized Alternative Descriptions" - the EIS/EIR was going to include a sidebar analysis of a pipeline versus open channel isolated facility. Where is this analysis?	**	
1114	1668	up front (ch 2)	water transfers	NY, EPA	Policy group will need to spend a good chunk of time developing a process by which agencies can work together to develop a uniform set of rules. Agency heads need to specify what the final form will be (policy, regs, etc.) specify which staff are responsible, and timeframe. Otherwise this will not get done.		

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